

September 30, 2004

Tracie Billington
Department of Water Resources
Division of Planning and Local Assistance

Via email to tracieb@water.ca.gov

RE: Integrated Regional Water Management Grant Program Guidelines, Public Draft 8/16/04

Dear Ms. Billington:

The Planning and Conservation League Foundation is pleased to have the opportunity to provide input into the development of the Integrated Regional Water Management Program (IRWMP). The Planning and Conservation League Foundation is dedicated to planning and natural resource conservation, air and water quality, environmental justice, and sustainable energy. We have reviewed the Draft Integrated Regional Water Management Grant Program Guidelines and we submit the following comments on behalf of our thousands of statewide members.

1. Funding levels for planning grants should be increased. Both the maximum limit for each grant and the total amount for planning projects should be increased. A \$500,000 limit for planning grants is too low and should be raised to at least \$1 million. In addition, the state should allocate at least \$20 million for planning grants. Given the costs and the extent of IRWM programs, increased funding is appropriate in order to encourage greater development and expanded implementation of these plans in more regions of the State.
2. Integrated Coastal Watershed Planning areas should be expanded to include Critical Coastal Areas. CWC §79563.5 states that, “planning areas shall be selected by the board in consultation with the State Coastal Conservancy and the Department of Fish and Game and shall include coastal watersheds that influence water quality in areas of special biological significance.” This does not require the Board to limit coastal planning areas exclusively to watersheds that drain directly into areas of special biological significance. Rather, the Board should expand the definition of coastal planning areas to include the areas identified as *Critical Coastal Areas* by the interagency Critical Coastal Areas Committee as part of California’s *Nonpoint Source Pollution Control Program*.

3. The definition of local match should include federal funding. Local match requirements should be met by any non-state funding, including local or federal funding. The guidelines are unclear as to whether the local match can be federal funds or expenses incurred by a federal partner in the project (e.g. planning work done by the Army Corps of Engineers).
4. Program preferences should not exclude flood management, recreation and access, and environmental and habitat protection and improvement. The draft guidelines convey an apparent preference for urban areas and construction projects. In addition, data requirements and evaluation criteria are two significant areas where the draft guidelines imply a preference to water supply and water quality. Each region of the state has varying water management issues that can be addressed through integration. A region's primary issue may not be water quality or water supply, but flood management, ecosystem restoration or recreation. Many worthwhile and beneficial projects may not meet these preferences implied in the draft guidelines language, deterring those agencies from applying for grants, and thus hindering the implementation of these beneficial projects. More inclusive language conveying that integration includes flood management, recreation and ecosystem restoration, as well as language articulating the importance of rural and non-construction projects would ensure good projects are not excluded from the grant process.
5. The guidelines should clarify whether or not the grant applicant must be a regional water management group or an individual agency of that group. In both the general solicitation guidelines (page 7) and Appendix C, the guidelines state that the application "must be submitted by regional agencies or groups." Later, the guidelines state that grant agreements will be executed with only one grant recipient. This is potentially problematic and unnecessarily expensive. While the applicant should be part of a regional group, the regional group should not be required to be the applicant. Costs for many regional groups are likely to increase if administrative functions are necessary, which seems inevitable if the group is the applicant.
6. The guidelines and evaluation criteria should recognize that, for some regions, having a wide range of water management strategies included in the plan is infeasible and that planning objectives may be met through integration of a limited suite of strategies. The planning process should have the leeway to focus on the issues most crucial to the region. However, the plan should demonstrate how the water management objectives of the IRWMP were considered prior to narrowing or focusing of issues.
7. The draft guidelines do not provide adequate direction for inclusion of environmental components in IRWM plans or implementation projects. Ecosystem protection and restoration is a clear objective of the bond program as evidenced by the list of

eligible projects (CWC §79561) and the minimum requirements for IRWM plans (CWC §79562.5). Consistent with the bond objectives and the California Water Code, the IRWM program should fund regional plans and projects that make ecosystem management a priority. The draft guidelines treat ecosystem activities as mitigation, compliance, or added benefits to the main projects. The guidelines should include ecosystem restoration and protection in the IRWM program preferences, statewide priorities, plan requirements, and evaluation and selection criteria.

8. The selection process and criteria are unclear. It appears the technical reviewers will create a numerical score for each project based on the criteria in Tables B.1, C.1, and C.2. It is not clear how these scores will be factored by the selection panel or how the items listed in Section F: Review Process (page 11) will factor against the technical review score. More detail should be included in the guidelines as to who (or of what areas of expertise) will comprise the selection panel, what the selection criteria are and how they will be weighted against the technical criteria, and what the timeline is for completion of the review process. Also, we suggest adding the Department of Fish and Game to the review panels to evaluate plans and projects that focus on or impact natural resources.
9. Preference for grant awards should go to those projects and areas that will maximize the effectiveness of this limited funding. Smart growth results in improved air quality, reduced energy and per capita water use, reduced costs of infrastructure, reduced polluted runoff, increased groundwater recharge, and reduced traffic congestion. Therefore, preference for grant awards given to water projects an IRWM plans serving areas practicing smart growth. These limited funds should not be spent in areas with poor planning, and inefficient resource use.
10. Notes on Appendix A by section:
 - B: Region Description – It is not clear if applicants will be required to describe the quality and quantity of water resources for all water in the region or just developed water (which many may assume).
 - C: Objectives – Of all the water management issues and strategies, why is water supply and demand singled out for description? Other water management needs may be equally or more important in a region.
 - J: Data Management – Water supply and water quality are singled out for assessment of existing monitoring efforts and data gaps. Data needs should be relative to plan objectives.

We appreciate the opportunity to provide these comments as well as your efforts to include the public in the development of these guidelines.

Thank you,

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